

**LITE DEPALMA GREENBERG LLC**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANNA CONOVER, PARRISH AND	:	
JACQUELINE SHERIDAN, BRYAN	:	Civil Action No.: 17-4625 (RMB)(JS)
AND JACQUELINE VAN VELSON,	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
v.	:	<b>PLAINTIFFS' NOTICE OF MOTION</b>
	:	<b>FOR PRELIMINARY SETTLEMENT</b>
PATRIOT LAND TRANSFER, LLC,	:	<b>APPROVAL AND RELATED</b>
WELLS FARGO BANK, N.A.,	:	<b>RELIEF</b>
	:	
<i>Defendants.</i>	:	
	:	

**PLEASE TAKE NOTICE** that on December 2, 2019 at 9 AM or as soon thereafter as the matter can be heard, Plaintiffs, Anna Conover, Parrish and Jacquelyn Sheridan, Bryan and Jacqueline Van Velso (together "Plaintiffs"), pursuant to Fed. R. Civ. P. 23(e), will move before Hon. Joel Schneider, U.S.M.J., to enter the proposed Order Granting Preliminary Approval to Class Action

Settlement (the “Preliminary Approval Order”). **Defendants do not oppose this motion.**

In support of this motion, Plaintiffs rely upon the accompanying Declarations of Michael Paul Smith, Timothy F. Maloney, and Bruce D. Greenberg, as well as the brief submitted herewith.

Plaintiffs state as follows:

1. The Parties have entered into a Settlement Agreement, which is attached to the Affidavit of Michael Paul Smith as Exhibit A.

2. The relief requested in this motion is assented to by Defendants, Wells Fargo Bank, N.A. and Patriot Land Transfer, LLC.

3. Plaintiffs respectfully request that the Court:

A. Grant Preliminary Approval to the Settlement Agreement as fair, adequate and reasonable;

B. Preliminarily certify the Class as defined in the Settlement Agreement for purposes of settlement;

C. Approve the Notice Plan in the Settlement Agreement and the proposed forms of notice, which are attached as Exhibits to the Settlement Agreement;

D. Appoint Plaintiffs as Class Representatives and Michael Paul Smith, Bruce D. Greenberg, and Timothy F. Maloney as Lead Class Counsel;

E. Schedule a Final Approval Hearing to consider the fairness, reasonableness and adequacy of the Settlement Agreement and whether final approval should be granted, as well as the application for an award of attorneys' fees and reimbursement of expenses and costs and service awards for the class representatives; and

F. Enter the proposed Preliminary Approval Order.

Dated: October 31, 2019

**LITE DEPALMA GREENBERG, LLC**

/s/ Bruce D. Greenberg

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**SMITH, GILDEA & SCHMIDT, LLC**

/s/ Michael Paul Smith

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**JOSEPH, GREENWALD & LAAKE, P.A.**

/s/ Timothy F. Maloney

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